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November 24, 2020

The Honorable Magistrate Judge William I. Arbuckle
VIA ECF

RE: Saunders v. McDonald, et al., No. 3:17-CV-1686

Dear Judge Arbuckle:

I am writing to request the scheduling of a status conference in the above-referenced matter.

The Plaintiff in this matter, DaJuan Saunders, has requested, in his initial requests for production of documents, the Internal Affairs file of the Defendant, Thomas McDonald. The Defendants have produced the file to Mr. Saunders aside from the thumb drive portion of the Internal Affairs File. The undersigned has spoken with individuals at SCI Coal Township on several occasions to try to facilitate this portion of the discovery but has been informed that no thumb drives are allowed into the facility for security purposes. It is important to note that this portion of the file consists of over eight thousand pages of text messages and the cost of printing and mailing same to Mr. Saunders would be prohibitive to the City Defendants. Mr. Saunders has filed a Motion for Accommodations at the facility for this file. Further, Mr. Saunders has propounded further discovery requests upon Defendants in recent days. It is important to note to Your Honor that this matter has gained substantial publicity due to Mr. Saunders' posting portions of the Internal Affairs file of Thomas McDonald on a Facebook page attributed to him.

Accordingly, in light of the above, the Defendants would request a status conference to discuss these matters and the possibility of the Court's recordation of its decisions relative to discovery at the time of the August 4, 2020 status conference.

Respectfully,

Jenna Kraycer Tuzze

cc: DaJuan Saunders